

Calvin L. Litsey (SBN 289659)
FAEGRE BAKER DANIELS LLP
1950 University Avenue, Suite 450
East Palo Alto, CA 94303-2279
Telephone: +1 650-324-6700
Facsimile: +1 650-324-6701
calvin.litsey@FaegreBD.com

Jeffrey S. Roberts (*pro hac vice*)
FAEGRE BAKER DANIELS LLP
3200 Wells Fargo
1700 Lincoln Street
Denver, CO 80203
Telephone: +1 303-607-3500
Facsimile: +1 303-607-3600
jeff.roberts@FaegreBD.com

Kathy L. Osborn (*pro hac vice*)
Ryan M. Hurley (*pro hac vice*)
FAEGRE BAKER DANIELS LLP
300 N. Meridian Street, Suite 2700
Indianapolis, IN 46204
Telephone: +1 317-237-0300
Facsimile: +1 317-237-1000
kathy.osborn@FaegreBD.com
ryan.hurley@FaegreBD.com

Stephen M. Judge (*pro hac vice*)
FAEGRE BAKER DANIELS LLP
202 S. Michigan Street, Suite 1400
South Bend, IN 46601
Telephone: +1 574-234-4149
Facsimile: +1 574-239-1900
steve.judge@FaegreBd.com

***Attorneys for Defendants Thomson
Consumer Electronics, Inc. and Thomson SA***

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,

No. 07-cv-5944-SC
MDL No. 1917

This Document Relates to:

*Electrograph Systems, Inc. et al. v.
Technicolor SA, et al., No. 13-cv-05724;*

*Alfred H. Siegel, as Trustee of the Circuit
City Stores, Inc. Liquidating Trust v.
Technicolor SA, et al., No. 13-cv-05261;*

*Best Buy Co., Inc., et al. v. Technicolor SA,
et al., No. 13-cv-05264;*

*Interbond Corporation of America v.
Technicolor SA, et al., No. 13-cv-05727;*

*Office Depot, Inc. v. Technicolor SA, et al.,
No. 13-cv-05726;*

*Costco Wholesale Corporation v.
Technicolor SA, et al., No. 13-cv-05723;*

**DECLARATION OF JEFFREY S.
ROBERTS IN SUPPORT OF THOMSON
SA'S RESPONSE TO THE SHARP
PLAINTIFFS' STATEMENT
REGARDING PENDING DISCOVERY
MOTIONS**

Judge: Hon. Samuel Conti

1 *P.C. Richard & Son Long Island*
2 *Corporation, et al. v. Technicolor SA, et al.,*
3 *No. 31:cv-05725;*

4 *Schultze Agency Services, LLC, o/b/o*
5 *Tweeter Opco, LLC, et al. v. Technicolor SA,*
6 *Ltd., et al., No. 13-cv-05668;*

7 *Sears, Roebuck and Co. and Kmart Corp. v.*
8 *Technicolor SA, No. 3:13-cv-05262;*

9 *Target Corp. v. Technicolor SA, et al., No.*
10 *13-cv-05686*

11 *Tech Data Corp., et al. v. Hitachi, Ltd., et*
12 *al., No. 13-cv-00157*

13 *Dell Inc. v. Hitachi Ltd.,*
14 *No. 13-cv-02171;*

15 *Sharp Electronics Corp., et al. v. Hitachi,*
16 *Ltd., et. al., No. 13-cv-01173*

17 *ViewSonic Corporation v. Chunghwa Corp.,*
18 *et al., No. 14-cv-02510*

19 I, Jeffrey S. Roberts, hereby declare as follows:

20 1. I am currently an attorney with the law firm Faegre Baker Daniels LLP, counsel
21 for Defendants, Technicolor SA (f/k/a Thomson SA). I am an active member in good standing of
22 the bars of the State of Colorado and am admitted to practice *pro hac vice* before the United
23 States District Court for the Northern District of California. I make this declaration in support of
24 Thomson SA's Response to the Sharp Plaintiffs' Statement Regarding Pending Discovery
25 Motions. The statements contained in this declaration are based on my personal knowledge and,
26 if called as a witness, I could competently testify to the following facts.

27 2. In May 2014, I spoke with Agn s Martin, Didier Trutt, and Emeric Charamel.
28 None of them are currently employed by Technicolor SA or any subsidiary or affiliate, and each
29 stated that he or she would not willingly sit for a deposition in this case. Others at Thomson SA
30 have also discussed this issue Martin, Trutt and Charamel and have received the same response.

DECLARATION OF JEFFREY S. ROBERTS IN
SUPPORT OF THOMSON SA'S RESPONSE TO
SHARP'S STATEMENT

No. 07-5944-SC; MDL No. 1917

